

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

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In re:

BED BATH & BEYOND INC., *et al.*,

Debtor.

Case No. 23-13359 (VFP)

Chapter 11

Judge Vincent F. Papalia

(Joint Administration Requested)

APPLICATION FOR *PRO HAC VICE* ADMISSION OF DAVID L. KANE, ESQ.

CMR Limited Partnership (“CMR”), by and through its attorneys, Vedder Price P.C., respectfully submits this application (the “Application”) for the *pro hac vice* admission of David L. Kane, Esq., of Vedder Price P.C., and represents as follows:

1. On April 23, 2023, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey (the “Chapter 11 Cases”).

2. David L. Kane, Esq. is a shareholder of the law firm of Vedder Price P.C., which maintains offices in Chicago, New York, Washington, D.C., San Francisco, Los Angeles, Dallas, London, Singapore, and Miami. Mr. Kane’s office is located at 222 North LaSalle Street, Suite 2600, Chicago, Illinois. Because of his familiarity with the facts and circumstances relevant to the Debtors in the Chapter 11 Cases, CMR requests that Mr. Kane be allowed to appear *pro hac vice*

for the purposes of representing CMR, a creditor of one or more Debtors in the Chapter 11 Cases, in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of David L. Kane, Esq., Mr. Kane is a member in good standing of the bar of the State of Illinois (2002) and is admitted to practice before the United States District Court for the Northern District of Illinois (2002), the United States District Court for the Central District of Illinois (2004), the United States District Court for the Eastern District of Wisconsin (2010), and the United States District Court for the Western District of Wisconsin (2010). Mr. Kane is also admitted to practice before the Seventh Circuit Court of Appeals (2010). Mr. Kane is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Kane has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Kane has also represented that he will arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the applicable annual fee pursuant to New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c) to admit David L. Kane, Esq. *pro hac vice* in the above-captioned chapter 11 cases.

Dated: New York, New York
May 8, 2023

Respectfully submitted,

VEDDER PRICE P.C.

By: /s/ Courtney M. Brown

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